

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re	)	
	)	Case No. 13-53846
	)	
CITY OF DETROIT, MICHIGAN,	)	In Proceedings Under
	)	Chapter 9
Debtor.	)	
	)	Hon. Steven W. Rhodes

**CERTIFICATION OF CAROL CONNOR COHEN PURSUANT TO  
ORDER GRANTING MOTION TO COMPEL FULL CLAWBACK OF  
DEBTOR’S DOCUMENT PRODUCTION AND RELATED RELIEF**

I, CAROL CONNOR COHEN, hereby certifies as follows:

1. I am a partner with the law firm of Arent Fox, LLP (“Arent Fox”), counsel for Ambac Assurance Corporation, a creditor and/or interested party in the above-captioned case.

2. I make this certification pursuant to the Court’s Order Granting Motion to Compel Full Clawback of Debtor’s Document Production and Related Relief, entered on May 13, 2014 (the “Order”).

3. On May 7, 2014, I received a hard drive with a document production made by the debtor, City of Detroit Michigan (the “Production”). The Production was thereafter processed and uploaded for review by Arent Fox’s third party vendor.

4. On May 13, 2014, I caused the Production to be sent by overnight

courier to City's Counsel, Jones Day, at 51 Louisiana Avenue, N.W., Washington, DC 20001, Attn: Mary Hale.

5. On May 14, 2014, I received confirmation that the Production was delivered to City's Counsel at the above address.

6. On May 13, 2014, I caused:

- a. All electronic copies of the Production or portions thereof to be purged from Arent Fox's and its third party vendor's computer system;
- b. All physical copies of the Production or any portions thereof to be destroyed; and
- c. All work-product reflecting the contents of any document in the Production to be destroyed except for lists of Bates numbers from the Production with corresponding subjects or issue codes that Arent Fox has created based on the Production.

Accordingly, Arent Fox has complied with each of the provisions of paragraph 2 of the Order.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 14, 2014

By: /s/ Carol Connor Cohen  
Carol Connor Cohen

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

	)	
In re	)	Case No. 13-53846
	)	
CITY OF DETROIT, MICHIGAN,	)	In Proceedings Under
	)	Chapter 9
Debtor.	)	
	)	Hon. Steven W. Rhodes

**CERTIFICATE OF SERVICE**

I hereby certify that on May 14, 2014, Certification of Carol Connor Cohen Pursuant to Order Granting Motion to Compel Full Clawback of Debtor's Document Production and Related Relief was filed and served via the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this matter.

Respectfully Submitted,

**ARENT FOX LLP**

Dated: May 14, 2014

By: /s/ Carol Connor Cohen  
CAROL CONNOR COHEN  
CAROLINE TURNER ENGLISH  
1717 K Street, NW  
Washington, DC 20036-5342  
(202) 857-6054  
Carol.Cohen@arentfox.com

DAVID L. DUBROW  
MARK A. ANGELOV  
1675 Broadway  
New York, NY 10019  
(212) 484-3900

and

**SCHAFER AND WEINER, PLLC**

DANIEL J. WEINER (P32010)  
BRENDAN G. BEST (P66370)  
40950 Woodward Ave., Ste. 100  
Bloomfield Hills, MI 48304  
(248) 540-3340  
bbest@schaferandweiner.com

*Counsel for Ambac Assurance Corporation*